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and the Putative Class*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**JANE ROE, et al.** individually and on behalf of  
all others similarly situated,

Plaintiffs,

**v.**

**DÉJÀ VU SERVICES, INC., et al.,** jointly and  
severally,

Defendants.

Case No: 19-cv-03960-LB

Related Cases:

16-cv-03371-LB  
17-cv-00138-LB  
17-cv-05288-LB  
17-cv-06971-LB  
14-cv-03616-LB

**PLAINTIFFS' NOTICE OF MOTION AND  
MOTION FOR PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT AND  
LEAVE TO FILE AMENDED COMPLAINT**

The Honorable Laurel Beeler

Date: April 21, 2022  
Time: 9:30 a.m.

**TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE THAT** on April 21, 2022 at 9:30 a.m., or as soon thereafter as the matter may be heard, in the United States District Court for the Northern District of California, 450 Golden Gate Ave., San Francisco, CA 94102, in Courtroom B – 15th Floor, before the Hon. Laurel Beeler, Plaintiffs will and hereby do move the Court for leave to leave to file the proposed Amended Complaint; conditional class certification; appointment of Jane Roes 1-2 as class representatives, appointment of the undersigned counsel as class counsel, preliminary approval of class action settlement; approval of class notice; and a date for the final approval hearing (the “Motion”). This Motion was filed in *Roe v. SFBSC Management, LLC*, Case 3:14-cv03616-LB (the “Roe Action”) and the proposed Amended Complaint would combine this Action with the Roe Action for settlement purposes, if granted.

As further explained in the Memorandum of Points and Authorities, filed in the Roe Action, the Motion is made on the grounds that proposed class settlement is fair and reasonable, and should be preliminarily approved.

The Motion is based on this Notice and the filings in the Roe Action, including the Memorandum of Points and Authorities, the Declarations of Joel B. Young, Jason T. Thompson, and the Doe Plaintiffs, supporting exhibits, the oral argument of the parties if requested by the Court, and the complete files and records of this action. Copies of the relevant Roe Action filings are concurrently filed herewith.

Respectfully submitted:

Date: March 7, 2022

SOMMERS SCHWARTZ P.C.

By: /s/ Trenton Kashima

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